

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	CRIMINAL NO. 15-30146-MJR
vs.	)	
	)	
MARCUS DEWAYNE THOMPSON,	)	
	)	
Defendant.	)	

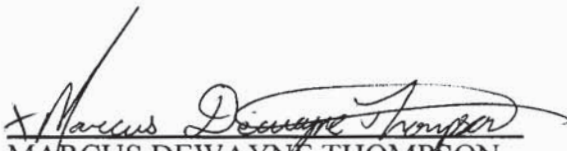
**STIPULATION OF FACTS**

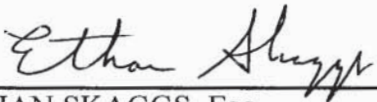
James L. Porter, Acting United States Attorney for the Southern District of Illinois, and Daniel T. Kapsak, Assistant United States Attorney for said District, herewith enters into the following Stipulation of Facts with the defendant,

1. During June and July 2015, Defendant knowingly conspired with co-defendant Robin Thompson, to harbor, transport, provide, obtain, advertise, and maintain by any means, MV-1, a minor, meaning an individual who had not yet attained the age of 18 years. Defendant also knowingly benefitted financially from participating in a venture that did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, MV-1. Defendant did so in reckless disregard of the fact and knowing that MV-1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, meaning any sex act, on account of which anything of value is given to or received by any person, and that threats of force, fraud, and coercion would be used to cause MV-1 to engage in a commercial sex act.
2. In early June 2015, Defendant enticed MV-1, a minor, to enter into his vehicle in Madison, Illinois, with the promise of helping her attain modeling work. Defendant then transported MV-1 to Farmington, Missouri, where Defendant picked up Robin Thompson at a residence there. After picking up Robin Thompson, Defendant informed Robin Thompson that he intended to "make money" by "posting" MV-1, a minor, on Backpage.com, a website used to offer commercial sex acts.
3. Thereafter, during this period, Defendant took part in a venture with Robin Thompson that involved the using of MV-1, a minor, to engage in commercial sex acts for monetary gain in various states, including Florida, Georgia, and Louisiana.
4. During this period, Defendant, along with Robin Thompson, took and posted numerous sexually explicit pictures of MV-1 on Robin Thompson's phone, including one nude picture, which were then posted on Backpage.com by either Defendant or Robin Thompson, as part of an online advertisement for commercial sex acts with MV-1.

5. During this period, Defendant, along with Robin Thompson, used Robin Thompson's e-mail account to post advertisements for commercial sex acts involving MV-1, a minor, on Backpage.com.
6. During this period, Defendant stole a camper, which he then used to transport MV-1 to various states to engage in commercial sex acts with customers. Defendant also took multiple sexually explicit photos of MV-1, including a nude picture, in this camper, which were then posted on Backpage.com by Defendant and Robin Thompson.
7. During this period, Defendant took part in procuring hotel rooms for customers to meet with MV-1, a minor, to engage in commercial sex acts. Defendant, along with Robin Thompson, routinely waited outside of these hotel rooms while MV-1 met with customers.
8. During this period, Defendant instructed MV-1 to ask customers prior to engaging in sex with MV-1 if they were "cops."
9. During this period, Defendant collected and kept proceeds provided to MV-1 from customers after MV-1 would meet with customers for sex at Defendant's direction.
10. Defendant knowingly became a member of this conspiracy with the intent to further the conspiracy.
11. Defendant's actions were in or affected interstate commerce.

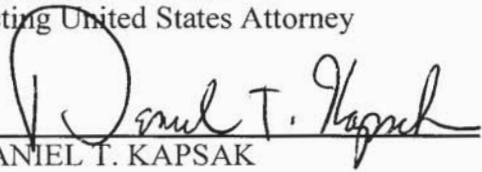
**SO STIPULATED:**

  
MARCUS DEWAYNE THOMPSON  
Defendant

  
ETHAN SKAGGS, Esq.  
Attorney for Defendant

Date: 5/12/16

JAMES L. PORTER  
Acting United States Attorney

  
DANIEL T. KAPSAK  
Assistant United States Attorney

Date: 5/13/16